

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

*The County of Cuyahoga, et al. v. Purdue
Pharma L.P., et al.*
Case No. 17-op-45004

MDL No. 2804

Hon. Dan Aaron Polster

**DECLARATION OF ASHLEY W. HARDIN
IN SUPPORT OF DEFENDANTS' MOTION TO EXCLUDE
THE OPINIONS AND TESTIMONY OF CRAIG MCCANN**

I, Ashley W. Hardin, declare as follows:

1. I am an attorney at Williams & Connolly LLP, counsel for Defendant Cardinal Health, Inc. in the above-captioned case.
2. I submit this declaration in support of Defendants' Motion to Exclude the Opinions and Testimony of Craig McCann.
3. Attached as Exhibit 1 is a true and correct copy of excerpts from the March 25, 2019 Expert Report of Dr. Craig McCann.
4. Attached as Exhibit 2 is a true and correct copy of excerpts from the April 15, 2019 Expert Report of James Rafalski.
5. Attached as Exhibit 3 is a true and correct copy of excerpts from the April 15, 2019 Second Supplemental Expert Report of Dr. Craig McCann.

6. Attached as Exhibit 4 is a true and correct copy of excerpts from the transcript of the deposition of Dr. Craig McCann, conducted on May 9 and 10, 2019.

7. Attached as Exhibit 5 is a true and correct copy of excerpts from the transcript of the deposition of James Rafalski, conducted on May 13 and 14, 2019.

8. Attached as Exhibit 6 is a true and correct copy of an excerpt from the May 10 Expert Report of John Macdonald III.

9. Attached as Exhibit 7 is a true and correct copy of a document produced in this litigation by the Department of Justice, reflecting Bates number US-DEA-00017912.

10. Attached as Exhibit 8 is a true and correct copy of excerpts from the transcript of the deposition of DEA 30(b)(6) representative Thomas Prevoznik, conducted on April 17 and 18 and May 17, 2019.

11. Attached as Exhibit 9 is a true and correct copy of excerpts from the transcript of the deposition of Joseph Rannazzisi, conducted on April 26 and May 15, 2019.

12. Attached as Exhibit 10 is a true and correct copy of an excerpt from the transcript of the deposition of Kyle Wright, conducted on February 28 and March 4, 2019.

13. Attached as Exhibit 11 is a true and correct copy of excerpts from the transcript of the deposition of Demetra Ashley, conducted on March 15, 2019.

14. Attached as Exhibit 12 is a true and correct copy of an exhibit used at the deposition of DEA 30(b)(6) representative Matthew Strait, reflecting a report by the Government Accountability Office issued on June 25, 2015.

15. Attached as Exhibit 13 is a true and correct copy of an excerpt from the transcript of the deposition of DEA 30(b)(6) representative Matthew Strait, conducted on May 31, 2019.

16. Attached as Exhibit 14 is a true and correct copy of an of an exhibit used at the deposition of James Rafalski, reflecting Plaintiffs' Responses to the Amended and Clarified Discovery Ruling 12 Supplemental Interrogatory Issued to Plaintiffs.

17. Attached as Exhibit 15 is a true and correct copy of an excerpt from the May 10, 2019 Expert Report of Dr. Anupam B. Jena.

18. Attached as Exhibit 16 is a true and correct copy of an excerpt from the May 10, 2019 Expert Report of Robert L. Brunner.

19. Attached as Exhibit 17 is a true and correct copy of an excerpt from Appendix 10 of the March 25, 2019 Expert Report of Dr. Craig McCann.

Dated: June 28, 2019

Respectfully submitted,

/s/ Ashley W. Hardin
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CERTIFICATE OF SERVICE

I, Ashley W. Hardin, hereby certify that the foregoing document as served via the Court's ECF system to all counsel of record.

/s/ Ashley W. Hardin
Ashley W. Hardin